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Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

William Burke,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:24-cv-01617-RFB-MDC

**Stipulation to Extend United States'
Deadline to File Response to Plaintiff's
Complaint**

(First Request)

Plaintiff, William Burke, through counsel and the United States of America, on behalf of Federal Defendants, through undersigned counsel, hereby agree and stipulate to extend the deadline to file a responsive pleading to Plaintiff's Complaint under the Federal Tort Claims Act by 10 days, until **November 22, 2024**. The parties enter into this stipulate based on the following:

1. Plaintiff filed the Complaint on September 3, 2024 (ECF No. 1).
2. Plaintiff served the United States with a copy of the Summons and Complaint on September 11, 2024.
3. The current deadline for the United States to respond to the Plaintiff's Complaint is November 12, 2024.

Plaintiff and the United States, through undersigned counsel, agree and stipulate that the United States' time to respond to the Plaintiff's Complaint shall be extended to November 22, 2024. This is the first request for an extension of time.

1 The extension of time is necessary for the United States' counsel additional time to
2 properly respond to the allegations in Plaintiff's complaint.

3 Therefore, the parties request that the Court extend the deadline for the United
4 States to file a responsive pleading to Plaintiff's Complaint to November 22, 2024.

5 This stipulated request is filed in good faith and not for the purpose of undue delay.

6 Respectfully submitted this 6th day of November 2024.

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8 BERTOLDO CARTER SMITH &
9 CULLEN

10 /s/ Lawrence J. Smith
11 LAWRENCE J. SMITH, ESQ.
12 Nevada Bar No. 6505
13 7408 W. Sahara Avenue
14 Las Vegas, Nevada 89117

15 *Attorney for Plaintiff*

JASON M. FRIERSON
United States Attorney

16 /s/ Karissa D. Neff
17 KARISSA D. NEFF
18 Assistant United States Attorney

19 *Attorneys for the United States*

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21 **IT IS SO ORDERED:**

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Hon. Maximiliano D. Couvillier III
UNITED STATES MAGISTRATE JUDGE
DATED: 11/7/2024